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California Customer Choice Team
Policy and Planning Division
California Public Utilities Commission
505 Van Ness Avenue
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November 12, 2018

To the California Customer Choice Team:

On October 23, 2018, the Customer Choice Project Team (“Project Team”) issued a Draft Gap Analysis and Choice Action Plan (“Plan”). The Institute for Market Transformation (“IMT”) appreciates the opportunity to provide comments on the Project Team’s thoughtful Plan. IMT’s brief comments relate to the opportunities the Plan presents to refine the rules and practices under which California local governments request and receive energy data from regulated energy utilities to engage in climate and energy planning.

IMT is a Washington, D.C.-based 501(c)(3) nonprofit that seeks to unlock the potential of high-performing buildings nationwide through development of innovative research, energy efficiency programs, and industry-leading policies. As part of this work, IMT supports and advises public sector actors, including local governments, to develop and implement cutting-edge policies and programs that catalyze the market for high-performing buildings. IMT has engaged with California cities through the City Energy Project and the Urban Sustainability Directors Network, as well as participated in state proceedings, such as the California Energy Commission’s development of regulations to implement Assembly Bill 802.

IMT’s comments focus on the Category of Consumer Protection and the Topic of Data Access. Based on our work with California local governments over the past several years, we agree with the Project Team’s finding that challenges exist with regard to the practices under which local governments receive access to aggregated energy usage data pursuant to the rules laid out in D.14-05-016. Local governments experience difficulties in obtaining consistent, usable, and accurate data that enables carbon accounting, energy planning, program design, stakeholder engagement, and measurement and verification. In our experience and based on practices with regard to community energy reporting in other states, these challenges can be due either to the design of the aggregation rules or the data

processing practices applied by regulated utilities in rules implementation, or both. To achieve California's ambitious statewide energy goals, local government efforts must be supported and enabled.

We also agree with the Recommendation that stakeholder input is required to better understand these issues, which can be nuanced. While additional engagement of local governments is unquestionably needed to understand the specific challenges here—and the best approaches to reduce barriers to local energy planning—the Project Team may need to calibrate how it engages those parties given their sometimes limited capacity.

IMT thanks the Project Team for the opportunity to comment on this Plan and looks forward to the next steps it recommends.

Sincerely,



Kelly B. Crandall
Manager, State and Local Policy
Institute for Market Transformation